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THE CITY OF NEW YORK  
LAW DEPARTMENT

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December 16, 2011

**VIA EMAIL**

Honorable Paul A. Crotty  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 735  
New York, New York 10007

✓ SO ORDERED: 19 DEC 2011

*Paul M. Crotty*  
HON. PAUL A. CROTTY  
UNITED STATES DISTRICT JUDGE

Re: Laura Roman-Malone v. The City of New York, et al.  
Case No. 11 Civ. 8560 (PAC)(KNF)

Dear Judge Crotty:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the City of New York ("Defendant City") in the above referenced action. Plaintiff, a former New York City police officer, alleges that she was subjected to a discriminatory hostile work environment in retaliation for a lawsuit she filed in 1999 and for exercising her First Amendment right to free speech, and asserts a constructive discharge claim, asserting that she was forced to retire in 2011 after twenty-years of service.

With the consent of plaintiff's counsel, I respectfully request that City Defendants' time to respond to the complaint be extended from December 20, 2011 until January 31, 2012. This is the City Defendant's first request for an enlargement of time to respond to the complaint. This enlargement of time will not affect any previously scheduled deadlines.

The enlargement of time is needed to enable me to conduct a thorough investigation of plaintiff's allegations, consult with my clients, and prepare an appropriate response to the complaint. Finally, plaintiff has named three individual employees of the New York Police Department ("NYPD") as defendants, Sgt. Vega, Lt. Scala, and Captain Cedric Raymond. This office requires time to determine whether these individuals have been properly served, and if so, make a determination under New York General Municipal Law § 50-k regarding the representation of these individuals in this case. Accordingly, I respectfully request

that the enlargement of time for the individual named defendants be applied sua sponte by the Court for the individually named defendants.

I thank the Court for its consideration of this request.

Respectfully submitted,

  
Jane E. Andersen  
Assistant Corporation Counsel

cc: Rocco Avallone, Esq. (email: [ravallone@cblawyers.net](mailto:ravallone@cblawyers.net))  
Attorney for Plaintiff